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# RESOURCE DEVELOPMENT COUNCIL

Growing Alaska Through Responsible Resource Development

August 25, 2016

Mr. Bud Cribley, State Director  
GMT2 Scoping Comments  
Bureau of Land Management  
222 W. 7<sup>th</sup> Avenue, Stop #13  
Anchorage, AK 99513

Via email to: [blm\\_ak\\_gmt2\\_comments@blm.com](mailto:blm_ak_gmt2_comments@blm.com)

Re: Greater Mooses Tooth 2 Project

Dear Director Cribley:

The Resource Development Council for Alaska, Inc. (RDC) is writing in support of the Greater Mooses Tooth (GMT2) project proposed by ConocoPhillips Alaska, Inc., within the National Petroleum Reserve-Alaska (NPR-A).

RDC is a statewide non-profit business association comprised of individuals and companies from Alaska's oil and gas, mining, forest products, fisheries and tourism industries. RDC's membership also includes Alaska Native corporations, local communities, organized labor and industry-support firms. RDC's purpose is to encourage a strong, diversified private sector in Alaska and expand the state's economic base through the responsible development of our natural resources.

The proposed GMT2 project would be connected by road and pipeline to the approved and existing GMT1 development. The project would include ancillary facilities to support up to 48 wells, including a production pad, pipeline, and road to facilitate development of petroleum resources within the Greater Mooses Tooth Unit. The project would produce oil from federal and Alaska Native Corporation lands within NPR-A.

A version of the GMT2 project was initially approved in the Record of Decision (ROD) of the Alpine Satellite Development Plan in 2004 and was included as a reasonably foreseeable development in the 2012 NPRA Integrated Activity Plan Environmental Impact Statement (EIS) and the 2014 GMT1 Supplemental EIS (SEIS). The proposed project is similar to the project approved in 2004, but includes several revisions, including a relocated drill site, increased road and pipeline length due to the relocation, and the elimination of overhead power lines. Modifications to the project reduce impacts to the environment and subsistence resources.

The project will bring meaningful benefits to local residents, the state, and the nation. Through the 7(i) provisions of the Alaska Native Claims Settlement Act, this project will provide significant revenues throughout the state through royalties and revenue sharing among Alaska Native shareholders. New oil production from GMT2 will help offset declining North Slope production. The project will create new jobs, generate revenues to the North

Slope Borough, the State of Alaska, and the federal government, while increasing throughput in the Trans-Alaska Pipeline System, currently running at three-quarters empty.

It is in the best interest of the Alaska economy and the nation that this project move forward. RDC requests that the benefits of this project to Alaska Native shareholders, the state's economy, and the nation be fully reflected and considered in the SEIS.

In conclusion, RDC supports the GMT2 project as proposed by the project proponent. RDC is fully confident the project will be developed in a responsible manner with minimal impacts to the environment and subsistence resources. We urge the Bureau of Land Management to move forward with the timely completion of the SEIS and ROD to support the project development schedule.

Thank you for the opportunity to comment on this important project.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Carl Portman', is positioned above the typed name.

Carl Portman  
Deputy Director